

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Karen C. Han,

Plaintiff,

-against-

Financial Supervisory Service,
a South Korean Corporation without capital;

and Hankook Tire & Technology Co., Ltd.,
a South Korean Corporation,

Defendants.

Case No. 1:23-cv-5451-MKV

DECLARATION OF NO JOON PARK

Pursuant to 28 U.S.C. § 1746, I, No Joon Park, declare as follows:

1. I am a national of South Korea, currently residing at 101 Dong 702 Ho, Ilshin Marina Apartment, Chungak 2-dong, Youngdo-ku, Pusan, South Korea. I am over 21 years old, have never been convicted of a felony or any crime of moral turpitude, and am competent to make this declaration.

2. I am the spouse of Karen C. Han, the plaintiff in the above-captioned lawsuit ("Lawsuit"). The Amended Complaint in the Lawsuit in Paragraph 13 states that: "Park seeks no relief against Defendants in this action. He is included in this Amended Complaint primarily to present factual allegations."

3. Attached hereto as **Exhibit A** is a true and correct copy of a news article

published by Money Today on April 16, 2025, that I printed out from the Google internet search site on or about May 3, 2025, immediately followed by my English translation of the news article in Korean language. I am fluent in both Korean and English. I served as Korean-English translator in the Army Intelligence Command of South Korea for 30 months. I went to graduate schools in Australia and the United States from 1991 to 1992. I lived in the United States since 2002 until recently.

4. Attached hereto as **Exhibit B** is a true and correct copy of a news article published by Newsis on April 18, 2025, that I printed out from the Google internet search site on or about May 2, 2025, immediately followed by my English translation of the news article in Korean language.

5. Attached hereto as **Exhibit C** is a true and correct copy of an English version of a news article published by Chosun Biz on April 16, 2025, that I printed out from the Google internet search site on or about May 10, 2025.

6. Attached hereto as **Exhibit D** is a true and correct copy of a news article published by Kyunghyang Shinmun on October 25, 2024, that I printed out from the Google internet search site on or about May 3, 2025, immediately followed by my English translation of the news article in Korean language.

7. Attached hereto as **Exhibit E** is a true and correct copy of an English version of a news article published by Chosun Biz on March 10, 2025, that I printed out from the Google internet search site on or about May 2, 2025.

8. Attached hereto as **Exhibit F** is a true and correct copy of a news article

published by Hankyoreh on April 21, 2025, that I printed out from the Google internet search site on or about May 10, 2025, immediately followed by my English translation of the news article in Korean language.

9. Attached hereto as Exhibit G is a true and correct copy of a document that I downloaded from the Official Court Electronic Document Filing System of the United States District Court for the District of Columbia on or about March 3, 2018.


10. My internet search results on or about May 10, 2025 show that Mr. Duk-Soo Han served as the Minister of Finance and Economy of South Korea from March 2005 to July 2006, and as the Ambassador to the United States from February 2009 to February 2012. About a few weeks after the Embassy Diplomatic Letter, which is described in Paragraph 64 of the Amended Complaint, was issued on September 14, 2005, I spoke with Mr. Sang-Min Yoo, the First Secretary in the South Korean Embassy in the United States, on the phone, and Mr. Yoo told me that the Embassy Diplomatic Letter was ultimately approved by the Minister of Finance and Economy of South Korea retroactively after the issuance, and therefore would not be revoked. Thereafter, during the period from 2009 to 2012, I filed civil petitions at least 4 or 5 times with the Ministry of Foreign Affairs and Trade of South Korea, urging it to rectify FSS's false legal status as organ of South Korean government in the United States. But the Ministry of Foreign Affairs and Trade referred all the petitions to the South Korean Embassy, which refused to process such petitions without giving me any reasons.

11. Attached hereto as **Exhibit H** is a true and correct copy of a news article published by Seoul Economic Daily on December 7, 2023, that I printed out from the Google internet search site on or about May 1, 2025, immediately followed by my English translation of the news article in Korean language.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is based personal knowledge and is true and correct.

DATED this 12th day of May, 2025

Executed in Pusan, South Korea

A handwritten signature in black ink, appearing to read 'No Joon Park', written over a horizontal line.

No Joon Park